IN THE UNITED STATES COURT OF FEDERAL CLAIMS

	(Bid Protest)	
LOOMACRES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 17-824C
	)	(Judge Coster Williams)
THE UNITED STATES,	)	,
	)	
Defendant.	)	

## JOINT MOTION FOR PROTECTIVE ORDER

Pursuant to Paragraph 16 of Appendix C of the Rules of the United States Court of Federal Claims (RCFC), plaintiff, Loomacres, Inc., and defendant, the United States, respectfully request that the Court to enter the attached proposed protective order in this case. The parties' proposed protective order is an unaltered copy of the Court's Form 8 protective order, which the parties believe to be sufficient for this case.

2

Respectfully Submitted,

## Counsels for the United States

CHAD A. READLER
Principal Deputy Assistant Attorney General

ROBERT E. KIRSCHMAN, JR. Director

s/ Douglas K. Mickle
DOUGLAS K. MICKLE
Assistant Director

s/ Meen Geu Oh MEEN GEU OH Trial Attorney Commercial Litigation Branch Civil Division U.S. Department of Justice Washington, DC 20530 Telephone: (202) 307-0184 Facsimile: (202) 307-0972

E-mail: Meen-Geu.Oh@usdoj.gov

Dated: November 28, 2017

## Counsel for Loomacres, Inc.

s/ Melody Westfall
Melody Westfall, Esq.
SCALFONE LAW PLLC
Office and Post Office Address
247 W. Fayette St., Ste. 203
Syracuse, NY 13202
Telephone: (315) 412-0440
Facsimile: (315) 216-5388